

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SCANSOFT, INC.,

Plaintiff,

v.

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILLICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR,

Defendants.

C.A. No. 04-10353-PBS

AFFIDAVIT OF CHRIS REINER

I, Chris Reiner, depose on oath and state as follows:

1. I am Vice President of Global Accounts for Defendant Voice Signal Technologies, Inc. ("Voice Signal"). In this position, I have responsibility for sales, business development, negotiating customer contracts, overseeing strategic customer accounts to meet sales and revenue objectives, forecasting sales and revenues, among other things.

2. As a seven-year employee and key executive of Voice Signal, I have extensive knowledge relative to Voice Signal's business development and strategy, sales activities and customer relationships, among other things.

3. Given my exposure to Voice Signal's confidential proprietary information, I was required to execute upon commencement of employment Voice Signal's so-called Proprietary Information and Inventions Agreement, which contains, among other things, a one-year non-compete provision. A true and accurate copy of my executed agreement, dated December 21, 1999, is attached hereto as Exhibit A.

4. In the past three months, I have been contacted on three separate occasions by recruiters associated with Nuance. On November 15, 2006, I was contacted by Kirk Wilcox, a Senior Recruiter at Nuance, via a message on "LinkedIn," a business networking website on which I have a profile. In his message, Mr. Wilcox told me that he was "recruiting for a Sr. level role here at Nuance that [he] would like to discuss" with me. I told Mr. Wilcox that Nuance's attempted solicitation was "[n]ot such a hot idea." A true and accurate copy of the messages between myself and Mr. Wilcox is attached hereto as Exhibit B.

5. On December 18, 2006, I was contacted via a message on LinkedIn by Alan Kitaman, who was identified in the message as the "Head of International Recruitment at Nuance Communications International."

6. Most recently, on January 23, 2007, I received a voicemail from a recruiter identified as "Caitlin," who informed me that she had been retained by Nuance and wished to speak with me regarding opportunities to work for Nuance. A true and accurate transcription of the message I received from Caitlin is attached hereto as Exhibit C.

Signed under the pains and penalties of perjury this 7th day of February, 2007.

/s/ Chris Reiner

Chris Reiner

CERTIFICATE OF SERVICE

I hereby certify as follows:

1. This document filed through the ECF system will be sent electronically to the registered participants in the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 7, 2007.

2. On February 7, 2007, a true and correct copy of this document and the accompanying pleadings was served by hand to Rebecca L. Hanovice, Esq. of Bromberg & Sunstein LLP, 125 Summer Street, Boston, MA 02111.

/s/ Sarah C. Columbia
Sarah C. Columbia